Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address	FOR COURT USE	EONLY		
Derrick Talerico (SBN 223763) David B. Zolkin (SBN 155410) WEINTRAUB ZOLKIN TALERICO & SELTH LLP 11766 Wilshire Blvd., Suite 730 Los Angeles, CA 90025 Telephone: 424-500-8552 Email: dtalerico@wztslaw.com dzolkin@wztslaw.com				
☐ Individual appearing without attorney Attorney for: Broadway Avenue Investments, LLC				
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION				
In re:	CASE NO.: 2:24-b	ok-12079-VZ (Jointly Administered)		
SEATON INVESTMENTS, LLC, et al.,	CHAPTER: 11			
Affects all Debtors.	NOTICE OF MOTION FOR: Order Authorizing Debtor to Obtain Post-Petition financing Pursuant to 11 U.S.C. Section 364			
Affects Seaton Investments, LLC (2:24-bk-12079-VZ)				
Affects Colyton Investments, LLC (2:24-bk-12080-VZ)				
X Affects Broadway Avenue Investments, LLC (2:24-bk-12081-VZ)				
Affects SLA Investments, LLC (2:24-bk-12082-VZ)	(Specify name of Motion)			
Affects Negev Investments, LLC (2:24-bk-12091-VZ)				
Affects Alan Gomperts (2:24-bk-12074-VZ)		Fahruary 25, 2025		
Affects Daniel Halevy (2:24-bk-12075-VZ) Affects Susan Halevy (2:24-bk-12076-VZ)	DATE: TIME:	February 25, 2025 11:00 a.m.		
	COURTROOM:	1368		
	PLACE:	255 East Temple Street Los Angeles, CA 90012		
Debtor(s).				

- 1. TO (specify name): The Honorable Vincent P. Zurzolo, United States Bankruptcy Judge, and all Parties in Interest:
- 2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
- 3. **Your rights may be affected**. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

- 4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
- 5. **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 0	02/04/2025	WEINTRAUB ZOLKIN TALERICO & SELTH LLP
		Printed name of law firm
		/s/ Derrick Talerico
	Signature	
		Derrick Talerico
		Printed name of attorney

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

11766 Wilshire Blvd., Suite 730, Los Angeles, CA 90025

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR** (specify name of motion) Motion of Debtor and Debtor in Possession Broadway Avenue Investments, LLC for Order Authorizing Debtor to Obtain Post-Petition Financing Pursuant to 11 USC 364;; Memorandum of Points and Authorities in SupportThereof manner stated below: 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) <u>02/04/2025</u>, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: See attached NEF Service List |X|Service information continued on attached page 2. SERVED BY UNITED STATES MAIL: On (date) _02/04/2025_ _ _ _ , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed. See attached US Mail Service List |X|Service information continued on attached page 3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _02/04/2025 the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed. The Honorable Vincent Zurzolo (via Priority Mail) United States Bankruptcy Court 255 East Temple St., Suite 1360 Los Angeles, CA 90012 Service information continued on attached page I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. 02/04/2025 Martha E. Araki /s/ Martha E. Araki

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Signature

Printed Name

Date

Seaton Investments, LLC - Jointly Administered

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC.: Derrick Talerico: dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy: zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: Scott R Albrecht: scott.albrecht@sgsattorneys.com;
 jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Tanya Behnam, Garrick Vanderfin**: tbehnam@polsinelli.com, tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com; gvanderfin@polsinelli.com, jnava@polsinelli.com; zyoung@polsinelli.com; mschuster@polsinelli.com;
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: Jacquelyn H Choi: iacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
- <u>Attorneys for Creditor United States of America on behalf of the Internal Revenue Service</u>: **Robert F Conte**: robert.conte@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Courtesy NEF/Interested Party: Christopher Cramer: secured@becket-lee.com
- Attorneys for Creditor Harvest Small Business Finance, LLC: Christopher Crowell: ccrowell@hrhlaw.com
- Attorneys for Creditors Archway Real Estate Income Fund I SPE I, LLC, Archway Broadway Loan SPE, LLC, fka Archway Real Estate Income Fund I REIT, LLC, Archway Real Estate Income Fund, and Plaintiff Archway Broadway Loan SPE, LLC: Michael G. Fletcher, Bruce D. Poltrock, Paige Selina Poupart, Gerrick Warrington: mfletcher@frandzel.com; ppoupart@franddzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditor Wells Fargo National Bank West: Todd S Garan: ch11ecf@aldridgepite.com;
 TSG@ecf.inforuptcy.com; tgaran@aldridgepite.com
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- Attorneys for Creditor Harvest Small Business Finance, LLC: Jacqueline L James: jjames@hrhlaw.com
- Courtesy NEF/Interested Party Avi Muhtar: Avi Edward Muhtar: amuhtar@eaccidents.com
- <u>Attorneys for Creditor UrbanLime Real Estate</u>: **Lovee D Sarenas**: lovee.sarenas@dinsmore.com; wendy.yones@dinsmore.com
- Attorneys for Creditor AIRE Ancient Baths Los Angeles, LLC: David B Shemano: dshemano@shemanolaw.com
- Attorneys for Creditor Wells Fargo Bank, N.A.: Jennifer C Wong: bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpregion16.la.ecf@usdoj.gov; Kelly L. Morrison: Kelly.l.morrison@usdoj.gov

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Broadway Avenue Investments, LLC Attn Alan Gomperts Manager 264 S. Oakhurst Dr Beverly Hills, CA 90212-3504

Los Angeles Division 255 E Temple St Los Angeles, CA 90012-3332 802 Mateo Street LLC Attn Daniel Halevy Manager 802 Mateo St Los Angeles, CA 90021-1712

Alan D Gomperts 264 S Oakhurst Dr Beverly Hills, CA 90212-3504 Alta Fire Pro Attn Albert Nikghosian, CEO, CFO PO Box 7007 Mission Hills, CA 91346-7007 Archway Real Estate Income Fund I REIT, LLC Attn Bobby Khorshidi, Manager of AOL GP, LLC Authorized Signer 10100 Santa Monica Blvd Ste 500 Los Angeles, CA 90067-4121

CA Dept of Tax and Fee Admin Account Info Group MIC29 PO Box 942879 Sacramento, CA 94279-0029 California Refrigeration & Supply Attn Officer 1926 Glendon Ave Apt 4 Los Angeles, CA 90025-4661

Capital One PO Box 30285 Salt Lake City, UT 84130-0285

Commune Events Inc Attn Daniel Halevy CEO/CFO 802 Mateo St Los Angeles, CA 90021-1712

Daniel Halevy 257 S. Linden Dr Los Angeles, CA 90212-3704 Employment Development Dept Bankruptcy Group MIC 92E PO Box 826880 Sacramento, CA 94280-0001

Franchise Tax Board Bankruptcy Section MS A-340 PO Box 2952 Sacramento, CA 95812-2952 Gomperts & Halevy Family Trust Alan Gomperts and Sharon Halevy Tstees 267 Oakhurst Dr Beverly Hills, CA 90212-3504 Halevy Family Trust Dated Sept 6 2010 Attn Susan Haley Trustee 257 S Linden Dr Beverly Hills, CA 90212-3704

Internal Revenue Service PO Box 7346 Philadelphia, PA 19101-7346 Joshua Mogin Esq Thompson Coburn LLP 10100 Santa Monica Blvd Ste 500 Los Angeles, CA 90067-4121 Los Angeles County Treasurer / Tax Collector Attn Bankruptcy Unit PO Box 54110 Los Angeles Ca 90054-0110

Mark Berkowitz CPA 5850 Canoga Ave Suite 220 Woodland Hills, CA 91367-6505 Mordechai Miky Acoca 1926 Glendon Ave #4 Los Angeles, CA 90025-4661 RG Fire Inc Attn Rafael Goforth Dominguez CEO/CFO 8721 Laurel Canyon Blvd Sun Valley, CA 91352-2919

Seaton Investments LLC Attn Alan Gomperts Manager 264 S Oakhurst Dr Beverly Hills, CA 90212-3504

Sharon Gomperts 264 S Oakhurst Dr Beverly Hills, CA 90212-3504 Sienna Rose Inc Attn Alan Gomperts CFO 433 Colyton St Los Angeles, CA 90013-2210

Southern California Edison Company Attn Steven D Powell CEO 2244 Walnut Grove Ave Rosemead, CA 91770

Sue Halevy 257 S Linden Dr Beverly Hills, CA 90212-3704 Archway Broadway Loan SPE LLC Frandzel Robins Bloom & Csato LC c/o Michael Gerard Fletcher 1000 Wilshire Blvd 19th FL Los Angeles, CA 90017-2457

United States Trustee (LA) 915 Wilshire Blvd Ste 1850 Los Angeles, CA 90017-3560